

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

-----X Docket NO. 21-cv-00473 (ERK)(PK)  
JOHNNA L. AYRES,

Plaintiff,

- Against -

**PLAINTIFF'S NOTICE  
OF MOTION**

ROBERT J. SHIVER, ROBERT J. SHIVER LLC,  
and PRUDENT REVERE CAPITAL GROUP, INC.,

Defendants.

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**PLEASE TAKE NOTICE** that upon all of the prior pleadings and proceedings hereto filed herein, the Declaration submitted by David G. Gabor, the Memorandum in Support of Plaintiff's Motion for Leave to Amend the Complaint, the proposed Second Amended Complaint and Jury Demand, the exhibit and attachments, that counsel shall move this Court pursuant to Fed.R.Civ.Pro. 15(a)(2), for leave to amend the complaint, and for such other relief as this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Fed. R.Civ.Pro. 6 and Local Rule 6.4 Defendants' opposition papers, if any, must be served upon the undersigned by the time required by the Rules.

**Dated:** September 1, 2021

Very Truly Yours,



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THE WAGNER LAW GROUP, P.C.

*Attorney for Plaintiff*

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